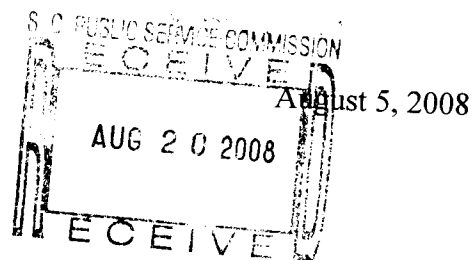


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To Whom It May Concern:



We would like to express our concern for the proposed regulation to allow "stretcher vans" to be operated with out certified attendants. We feel that the regulations that DHEC has set forth in regards to convalescent transport units should be sufficient. The proposed regulation seems very unsafe for the patients required to use their services. These patient are in such a bad state of health that they are not even able to sit in a wheel chair unassisted for any substantial amount of time. That being said it seems obvious that medical monitoring is required. These patients are being monitored at all times whether they be homebound and assisted by home health nurses or they reside in a nursing home where they receive total care.

The regulation seems to be contradictory of itself. In section C2 the proposal states "when the medical condition of a patient suddenly changes and requires care to be rendered, the operator of the of the stretcher van will immediately contact the local 911 dispatcher to request help, then notify their own base to advise them of the situation. Appropriate basic first aid shall be initiated and continued until the EMS service has intercepted the transport or arrival at the hospital." We would like to know, who will be providing this "first aid" and with what equipment and training, since this regulation sets forth no minimum medical training for personnel. Also under Section B 9, states that "A stretcher van shall not contain any medical equipment or supplies or display any marking, symbols or warning devices that imply that it offers medical care or ambulance transportation." Which leaves the question what equipment will they use to render this first aid?

Our next concern is, what standard are the vehicles going to be held to? The proposal only states that the vans have to comply with the same safety standards as all South Carolina Vehicles. Does this mean that anyone off the street can place a locking mechanism and a stretcher in their minivan and pass the qualifications for a Certificate of Public Convenience and Necessity? Somebody has to be responsible for these patients and have their best interest in mind. After all isn't our number one priority to be a patient advocate?

Thanks for your attention in this matter,

Sincerely,

Kelly Padgett
Jon Beck EMT-I 94772
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Jamie Couel